

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BENJAMIN SINGER

*

Plaintiff

*

Case No.:

vs.

*

CPUS BREWERS HILL LP, et al

*

Defendant

*

NOTICE OF REMOVAL

COMES NOW, CPUS Brewers Hill, LP, Defendant, by and through its counsel, Matthew T. Angotti and Zachary S. Gilreath, pursuant to 28 U.S.C 1441, *et seq.* and hereby files the following Notice of Removal, and for good cause states as follows:

1. Plaintiff, Benjamin Singer, has filed an action in the Circuit Court of Maryland for Baltimore City against Defendant CPUS Brewers Hill, LP and Defendant Avenue5 Residential, LLC, alleging a slip, trip and fall accident was caused by the negligence of Defendant CPUS Brewers Hill, LP and Defendant Avenue5 Residential, LLC. A copy of all pleadings on file in the Circuit Court of Maryland for Baltimore City are attached hereto as Exhibit 1.

2. The case is removable to this court based on diversity jurisdiction because Plaintiff is a resident of Baltimore County, Maryland, Defendant CPUS Brewers Hill, LP, is a Delaware limited partnership with its principal office in Los Angeles, California, and Avenue5 Residential, LLC is a Delaware limited liability corporation with its principal office in Seattle, Washington. The amount in controversy exceeds \$75,000.00 as Plaintiff claim in excess of \$75,000.00 in damages.

3. Defendant CPUS Brewers Hill, LP was first served a copy of the Summons and Complaint on August 11, 2021.

WHEREFORE, Defendant, CPUS Brewers, LP hereby prays the action against it be removed to this court.

/s/ Matthew T. Angotti

Matthew T. Angotti, (MD Bar No. 5949)

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/s/ Zachary S. Gilreath

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Attorneys for Defendant, CPUS Brewers Hill LP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of September, 2021 a copy of Defendant's

Notice of Removal was eserved and/or mailed to:

Thomas C Costello, Esq.

Matthew T. Holley, Esq.

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Attorneys for Plaintiff Benjamin Singer

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Serve On: Registered Agent Solutions Inc.
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Pasadena MD 21122
Defendant

/s/ Matthew T. Angotti
Matthew T. Angotti, Esq. (#5949)
/s/ James P. O'Brien
Zachary S. Gilreath, Esq. (#21824)